

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
NATIONAL POSTAL MAIL HANDLERS UNION WITNESS HOGROGIAN
(USPS/NPMHU-T2-1—8)
(May 23, 2012)**

Pursuant to Rules 25 through 28 of the Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production to National Postal Mail Handlers Union witness Paul Hogrogian (NPMHU-T-2).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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Instructions and Definitions

The term “describe” shall mean to detail in full, with specificity, the event or situation at issue.

The term “documents” has the meaning as ascribed within the Federal Rules of Civil Procedure and includes any documents or things that constitute or contain matters that are relevant to the subject matter of this proceeding and that are in the custody or control of the witness.

The term “relating” shall mean pertaining, describing, referring, evidencing, reflecting, discussing, showing, supporting, contradicting, refuting, constituting, embodying, containing, concerning, identifying, or in any way logically or factually connected with the matter discussed.

The words “or” and “and” shall be read in the conjunctive and not in the disjunctive wherever they appear, and neither of these words shall be interpreted to limit the scope of a request. The use of a verb in any tense shall be construed as the use of the verb in all other tenses and the singular form shall be deemed to include the plural, and vice-versa. The singular form of any noun shall be deemed to include the plural, and vice-versa.

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Interrogatories and Requests for Production

USPS/NPMHU-T2-1: On page 2, lines 7 through 8 of your testimony, you state “I don’t believe that the loss of revenue will more than offset any savings that the AMPs may contain or ever produce.” Please describe, in detail, your experience, education, or training related to revenue assessment, plans or strategies and other economic tools used to develop and explore revenue assessment, including, but not limited to, your experience, education, or training to support your statement and produce any documents or data that you relied upon in support of your statement.

USPS/NPMHU-T2-2: On page 2, lines 23 through 25 of your testimony, you state that “[g]iven this massive increase, I am not confident that Brooklyn has the space to handle the increased volume, especially given that USPS will also have to move additional machines to Brooklyn.” Please state your understanding of whether the Postal Service included in the Staten Island P&DF AMP study an assessment of the mail volume, arrival profile, and delivery points when determining the equipment set planning and produce any documents or data that you relied upon in support of your statement.

USPS/NPMHU-T2-3: On page 3, lines 9 through 10 of your testimony, you state that you “see no evidence that the Postal Service considered this relative productivity when deciding to end mail processing at the Staten Island facility.”

- a. Please refer to the Response of USPS Witness Williams to Question from Commissioner Taub During March 20, 2012 Cross-Examination, pages 5 through 9, which was filed on March 30, 2012, available at:

<http://www.prc.gov/Docs/81/81803/V2.p.422.HW.Dave.pdf>

<http://www.prc.gov/Docs/81/81803/Homework.Vol.2.p.422.xls>

Prior to filing your testimony with the Commission, did you have the opportunity to review and consider this response, including the information under the heading “Specific description of AMP savings calculations: mail processing workhours moving from the losing site to the gaining site?”

- b. If you did not consider the materials identified in part (a), please explain why. If you did consider those materials, please explain the statement in light of those materials.

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USPS/NPMHU-T2-4: On page 3, lines 11 through 14 of your testimony, you state:

In addition, even the Postal Service concedes that it cannot close the Staten Island facility, as it will need this facility to conduct its collection consolidation prior to transfer to Brooklyn, dock transfer the mail processed in Brooklyn to the corresponding 14 stations, and maintain the Registry and Express operations in Staten Island (see pages 4-5 of AMP).

Please identify with specificity, the language on pages 4-5 of the Staten Island P&DF AMP Study that supports this statement.

USPS/NPMHU-T2-5: On page 3, lines 14 through 16 of your testimony, you state that “[g]iven the volume of mail in Staten Island, I do not believe that the Postal Service’s plans adequately staff the three (3) hub operations that will remain in Staten Island”

- a. Please confirm whether this statement assumes that the tractor-trailer service to the New Dorp Station and the South Shore Annex would be cross-docked at Staten Island.
- b. If your answer to subpart (a) is not affirmative, please explain.
- c. Please describe, in detail, your experience, education, or training related to the assessment of staffing needs at postal facilities, including, but not limited to, your experience, education, or training to support your statement and produce any documents or data that you relied upon in support of your statement.

USPS/NPMHU-T2-6: On page 3, lines 19 through 20, you state that you are “extremely concerned that the Postal Service’s process for considering these consolidations did not allow for sufficient public input into the process.”

- a. Please provide your understanding of the Postal Service's obligation to solicit and consider public input in relation to a mail processing plant consolidation, including, but not limited to, identification of any internal instructions that form the basis for your belief that the current process is not sufficient.
- b. In your view, is it possible for a public input process to comply with applicable internal instructions but still be deemed as not sufficient by a concerned postal employee or member of the public?

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USPS/NPMHU-T2-7: On page 4, lines 10 through 11 of your testimony, you state “I do not believe these operational changes will result in significant labor savings.” Please describe, in detail, your experience, education, or training related to the assessment of labor savings, including, but not limited to, your experience, education, or training to support your statement and produce any documents or data that you relied upon in support of your statement.

USPS/NPMHU-T2-8: On page 4, lines 22-24 of your testimony, you state that “[a]s demonstrated in this presentation, the Postal Service is not going to achieve significant labor efficiency by changing the operating windows.”

- a. Please confirm whether the presentation referenced is a draft document, intended for internal review and discussion only (as identified on pages 6, 7, and 14-20 of Attachment 2 of your testimony).
- b. If your answer to subpart (a) is not affirmative, please explain.
- c. Please identify the source of the attachment, including any information that confirms whether the information provided in the presentation was verified by Postal Service Headquarters.